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Hon. Lorna G. Schofield  
United States District Judge  
Southern District of New York  
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Date  
July 17 2023

By ECF

**Re: Serifos Maritime Corporation v. Glencore Singapore Pte Ltd.,  
S.D.N.Y. Case No. 1:22-cv-8012 (LGS)**

Dear Judge Schofield,

This firm represents Glencore Singapore Pte Ltd. ("GSPL") in the above-referenced action. We write jointly with counsel for Serifos Maritime Corporation ("Serifos") and Andros Maritime Agencies Ltd. ("Andros") pursuant to the Court's Order dated January 31, 2023 and Rule IV.A.2 of Your Honor's Individual Rules and Procedures for Civil Cases to provide the Court with an update on the status of discovery in this action.

GSPL filed a Motion to Dismiss the amended complaint in its entirety on February 14, 2023 (ECF No. 27). That motion was fully briefed on March 17, 2023 and remains pending.

Plaintiffs served an initial set of requests for production of documents and an initial set of interrogatories directed to GSPL on February 17, 2023. GSPL served responses and objections on March 20, 2023. Plaintiffs served a second set of requests for production of documents directed to GSPL on June 2, 2023. GSPL served responses and objections on July 5, 2023. GSPL served supplemental responses to plaintiffs' interrogatories on July 13, 2023.

GSPL served initial sets of requests for production of documents and initial sets of interrogatories directed to Serifos and Andros on February 28, 2023. Andros and Serifos served responses and objections on April 3, 2023.

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The parties exchanged initial document productions on May 5, 2023. GSPL produced 387 documents comprising 1,430 pages and plaintiffs produced 213 documents comprising 1,162 pages. On June 2, 2023, plaintiffs made a second production of 153 documents comprising 233 pages. On July 14, 2023, GSPL made a second production of 20 documents comprising 65 pages. GSPL anticipates making an additional production in the coming week.

Plaintiff served a notice of 30(b)(6) deposition on GSPL on July 10, 2023. GSPL intends to serve notices on plaintiffs in short order. The parties will meet and confer regarding the schedule and scope of depositions.

The parties are exchanging letters and meeting and conferring regarding several issues that may require the Court's intervention. The parties will follow the procedures for raising any such disputes set forth in Your Honor's Individual Practices and the Local Rules of the Southern District of New York. Should the parties not be able to resolve these issues in short order, they will take prompt action to address them consistent with these directives.

Plaintiffs intend to respectfully request a pre-motion conference for a motion to compel on two issues which the parties have been unable to resolve to date. However, to avoid burdening the Court with more than one pre-motion request, plaintiffs have agreed to wait until defendant's additional production this week to assess whether additional issues may be resolved without Court intervention.

The current case management order (ECF No. 25) contemplates a September 30, 2023 deadline for fact discovery. The parties are working diligently to meet the Court-scheduled deadlines for compliance.

\* \* \*

We are available for a conference to discuss any of the above matters at the Court's convenience.

Respectfully submitted,

*/s/ Peter J. Behmke*

Peter J. Behmke

cc: All Counsel of Record (via ECF)